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January 11, 2024

VIA ECF

Honorable Stewart D. Aaron United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Quirindongo v. Commissioner of Social Security

Civil Action No. 1:23-cv-09124-SDA

Dear Judge Aaron,

We write on behalf of our client, Michelle Quirindongo, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on January 17, 2024, per the Court's October 18, 2023 Standing Scheduling Order. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has many overlapping deadlines for Social Security briefs due in the next two weeks and has counsel out on a medical leave.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **April 16**, **2024**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **July 15, 2024**; and

Honorable Stewart D. Aaron January 11, 2024 Page Two

• Plaintiff to file her reply, if any, on or before: July 29, 2024.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Nahid Sorooshyari, Esq.

Application GRANTED. SO ORDERED.

Dated: January 11, 2024

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